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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CR 07-40014

Plaintiff,

**INDICTMENT**

vs.

DAVID BOSCHEE,

Defendant.

TRAVEL WITH INTENT TO ENGAGE IN  
ILLEGIT SEXUAL CONDUCT; USING  
INTERNET TO ENTICE A CHILD TO  
ENGAGE IN UNLAWFUL SEXUAL  
ACTIVITY

18 U.S.C. §§ 2423(b) and 2422(b)

The Grand Jury charges:

**COUNT 1**

On or about September 29, 2006, in Minnehaha County, District of South Dakota and elsewhere, the defendant did knowingly travel in interstate commerce, for the purpose of engaging in illicit sexual conduct with T.H., a minor, who had not attained the age of 18 years, and which conduct would be in violation of Chapter 109A (namely section 2243(a), sexual abuse of a minor or ward) if the sexual act occurred in the territorial jurisdiction of the United States, all in violation of 18 U.S.C. § 2423(b).

**COUNT 2**

On or about September 29, 2006, in the State and District of South Dakota, by using the mail, and facilities of and means of interstate commerce (namely, the Internet), the defendant, David Boschee, did knowingly and intentionally persuade, induce, entice, and coerce a minor, who had not yet attained the age of 18, to engage in sexual activity for which the defendant could be charged with

a criminal offense, namely, criminal sexual conduct in violation of South Dakota Codified Law §§ 22-22-1(5) and 22-22-7, all in violation of 18 U.S.C. § 2422(b).

A TRUE BILL:

Christine K. Dill  
Foreperson

MARTY J. JACKLEY  
UNITED STATES ATTORNEY

By: Marty J. Jackley

FORFEITURE ALLEGATION

1. The allegations contained in this indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to 18 U.S.C. § 2253(a).
2. If convicted of an offense set forth above, David Boschee, the defendant herein, shall forfeit to the United States any and all materials or property used or intended to be used in the commission of the offense. Such property includes, but is not limited to, the following specific items found in the possession of David Boschee on or about January 29, 2007:
  1. Apple Computer monitor I-MAC model, serial # YD4424WSPP7;
  2. Western Digital external hard-drive, serial # WCANK2361165.